

# Disciplinary and Other FINRA Actions

## Firm Suspended

**David Lerner Associates, Inc** ([CRD #5397](#), Syosset, New York)

May 20, 2025 – A Letter of Acceptance, Waiver and Consent (AWC) was issued in which the firm was suspended from engaging in the sale of proprietary, illiquid products, for two years, censured, ordered to pay \$1,002,566.16, in restitution to customers, and required to comply with the undertakings enumerated in the AWC. In light of the firm's agreement to pay restitution, the anticipated costs associated with the non-monetary sanctions, and the firm's financials, a fine was not imposed. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to reasonably supervise sales of two illiquid, proprietary limited partnerships to thousands of customers. The findings stated that the firm failed to respond to red flags that its representatives were making unsuitable recommendations of the limited partnerships and that updates to information on customer investment profiles submitted in connection with those sales resulted in records reflecting the customers meeting eligibility criteria for the purchases under the firm's written supervisory procedures (WSPs). The firm also was aware that certain representatives recommended the limited partnerships to senior customers, which raised potential suitability concerns based on the products' illiquid nature and that firm representatives resubmitted trades that the firm's system originally rejected because the customer investment profiles did not meet the requirements of the WSPs. The findings also stated that the firm through its representatives, recommended the limited partnerships to approximately 200 customers for whom the products were unsuitable. These included more than 120 unsuitable sales to customers aged 76 or older whose investment profiles were updated contemporaneous to the recommendations in a manner that resulted in the customers meeting eligibility criteria for the purchases under the firm's WSPs. These also included sales to customers for whom the limited partnership was unsuitable based on the customers' lack of sophistication or desire for safe, income-generating investments; and customers who, as a result of their limited partnership purchases, and their individual liquidity needs, were unsuitably concentrated in illiquid products. ([FINRA Case #2019063686211](#))

## Firms Fined

**Pinnacle Investments, LLC** ([CRD #142910](#), East Syracuse, New York)

May 1, 2025 – An AWC was issued in which the firm was censured, fined \$65,000, ordered to pay \$53,847.99, plus interest, in restitution to

## Reported for July 2025

FINRA has taken disciplinary actions against the following firms and individuals for violations of FINRA rules; federal securities laws, rules and regulations; and the rules of the Municipal Securities Rulemaking Board (MSRB).

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customers, and required to comply with the undertaking enumerated in the AWC. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish, maintain, and enforce a reasonably designed supervisory system, including WSPs, concerning recommendations of inverse, or leveraged exchange traded funds or notes (NT-ETPs). The findings stated that the firm's WSPs and training regarding the recommendation of NT-ETPs did not address Rule 15l-1 of the Securities Exchange Act of 1934 (Reg BI) as it applied to these products. In addition, the firm required registered representatives to sign and initial each page of an attestation stating that he or she was knowledgeable about NT-ETPs and was aware of the risks of holding them for more than a single trading session but did not further confirm that those representatives understood the features and risks unique to NT-ETPs. The firm's WSPs required a supervising principal to review every recommended NT-ETP transaction but did not address NT-ETP holding periods or provide any guidance as to how the intended holding period should be considered in connection with NT-ETP recommendations and the customer's best interest. The firm also did not establish a supervisory system to facilitate such an assessment. Indeed, the firm's supervisory review of NT-ETP recommendations was limited to verifying that registered representatives recommending the purchase of NT-ETPs had signed the attestation. The firm failed to identify that a registered representative was recommending that his customers buy and hold NT-ETPs for durations that were not in their best interest, resulting in \$53,847.99 in realized losses. The firm has revised its WSPs for NT-ETPs and began using a monthly exception report to identify the holding period of all NT-ETPs held in customer accounts. The findings also stated that the firm's supervisory system was not reasonably designed to monitor for discretionary and/or unauthorized trading in customer accounts. The firm did not permit its registered representatives to exercise discretion in their customers' commission-based accounts. However, the firm relied exclusively on next-day, manual reviews of the trade blotter, which failed to detect red flags of discretionary trading, such as instances where multiple unrelated customers purchased the same security on the same day. The firm later attempted to implement an automated system to monitor for potentially unauthorized trading and discretionary trading, but that system was ineffective due to technical issues. As a result, the firm failed to detect at least one registered representative's pattern of same-day, same-security trades in the accounts of multiple unrelated customers and failed to take steps to verify that the registered representative was contacting each customer before every trade to obtain authorization as was required. The findings also included that the firm failed to conduct timely inspections of six branch offices and one Office of Supervisory Jurisdiction (OSJ). The firm failed to conduct annual inspections of an OSJ and was unable to provide any written records demonstrating that, between 2016 and 2021, it had inspected these branch locations within three years as required. ([FINRA Case #2022073421202](#))

**Silver Leaf Partners, LLC ([CRD #126694](#), New York, New York)**

May 2, 2025 – The firm appealed a Securities and Exchange Commission (SEC) decision to the United States Court of Appeals for the Second Circuit. The SEC decision sustained the National Adjudicatory Counsel (NAC) findings and sanctions imposed against the firm. The firm was fined \$50,000 for paying transaction-based compensation to non-members. It was fined an additional \$50,000 for failing to establish and maintain a supervisory system designed to prevent payments to non-members and failing to reasonably supervise its corporate advisory business. The firm was ordered to retain an independent consultant to review its policies, systems, and procedures, and it was suspended from engaging in its corporate advisory business, including making introductions to stock loans and block trades, until it has certified its implementation of the independent consultant's recommendations. The findings stated that the firm knew about, approved and facilitated the payments of more than \$50,000 in transaction-based compensation to an unregistered finder. In addition, the firm directly deposited more than \$2.6 million in transaction-based compensation into bank accounts owned by non-member entities. Each of the non-member entities was affiliated with a person registered with the firm. These payments represented transaction-based compensation earned by the registered persons on securities transactions for the firm. Previously, the SEC had notified the firm that its practice of paying commissions to its registered persons' entities was among the firm's deficiencies and weaknesses. The findings also stated that the firm failed to establish and maintain a supervisory system reasonably designed to achieve compliance with applicable securities laws, regulations and FINRA rules. Despite recognizing the risks involved in its corporate advisory business, the firm did not implement any system at all to supervise that business and had no WSPs for it. The firm did not correct its supervisory deficiencies even after encountering glaring red flags in its dealings with an outside company involved in its corporate advisory business. The firm also failed to supervise its payment of transaction-based compensation to non-members. The firm's WSPs regarding its compensation practices were not tailored to its business and did not address payment of transaction-based compensation to unregistered finders or non-member entities affiliated with the firm's registered persons. Nor did the WSPs explain how the firm would ensure compliance with, or detect violations of, its own WSPs and NASD Rule 2410.

The sanctions are not in effect pending the review. ([FINRA Case #2014042606902](#))

**Global Financial Services L.L.C ([CRD #35699](#), Houston, Texas)**

May 8, 2025 – An AWC was issued in which the firm was censured, fined \$50,000, and required to comply with the undertakings enumerated in the AWC. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish and maintain a supervisory system,

including WSPs, reasonably designed to achieve compliance with Reg BI and FINRA rules as they relate to recommendations of volatility-linked exchange-traded products (ETPs) and the risk of recommending a single foreign currency denominated bond at concentration levels inconsistent with the customers' profiles. The findings stated that as a result of its unreasonable supervisory system and procedures, the firm failed to detect that a registered representative of the firm made recommendations that violated Reg BI's Care Obligation and made unsuitable recommendations to non-retail customers. In addition, the firm failed to detect that the same registered representative made recommendations to the same customers to purchase a foreign currency denominated bond, after its credit rating declined, in amounts that resulted in concentration levels in their accounts that were inconsistent with their investment profiles. ([FINRA Case #2022074734101](#))

**Webull Financial LLC ([CRD #289063](#), New York, New York)**

May 8, 2025 – An AWC was issued in which the firm was censured and fined \$1,600,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to reasonably supervise or retain social media communications promoting the firm. The findings stated that certain influencer communications promoting the firm were not fair and balanced and included exaggerated and promissory statements. The firm failed to review and approve all influencers' posts about the firm and failed to preserve records of those posts. The firm failed to establish, maintain, and enforce a reasonably designed supervisory system, including WSPs, for influencers' retail communications. The firm did not have a registered principal review and approve all influencers' static posts or options communications prior to posting on social media platforms. The firm also did not review all influencers retail communications posted in online interactive electronic forums in the same manner as required for supervising and reviewing correspondence. The findings also stated that the firm failed to deliver its customer relationship summary (Form CRS), failed to make and preserve required related records, and failed to establish and maintain a supervisory system reasonably designed to achieve compliance with its Form CRS obligations. The firm timely filed and published on its website its Form CRS by the initial compliance date, but the firm failed to develop and implement a system to ensure delivery of a copy of it to customers opening accounts until approximately October 2022, when the firm launched a new document management system. Moreover, even after the firm established a system for delivery of the Form CRS to new broker customers, a system error caused the firm to fail to deliver Form CRS to those customers until December 2022. The findings also included that the firm failed to provide a consolidated display that complied with the Vendor Display Rule and failed to reasonably supervise for compliance with the Vendor Display Rule. The firm's default display, which was utilized by the majority of its customers through its desktop, mobile, tablet and web platforms, included market data that was limited to only one market. FINRA

found that the firm failed to establish, document, and maintain financial risk management controls and supervisory procedures reasonably designed to prevent the entry of erroneous orders. The firm maintained single order quantity and price controls that were too high to prevent the entry of erroneous orders in certain securities. FINRA also found that the firm failed to review and approve certain retail communications posted by its registered representatives or preserve records of those communications. At least 70 registered representatives posted messages concerning securities trading on an online interactive electronic forum maintained by a firm affiliate, which was accessible through the firm's mobile application. Certain posts contained links to the firm's website where users could trade those securities through the firm's brokerage accounts. ([FINRA Case #2021072231801](#))

**Siebert Williams Shank & Co., LLC ([CRD #42568](#), New York, New York)**

May 9, 2025 – An AWC was issued in which the firm was censured and fined \$55,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to report the correct time of trade and failed to report certain municipal securities transactions to the Municipal Securities Rulemaking Board's (MSRB) Real-Time Transaction Reporting System (RTRS). The findings stated that due to a default setting on the firm's order management system, instead of reporting the time the trade was executed on the system, the firm reported the later time at which the firm's personnel confirmed the customer order. This also caused trades to be reported to the RTRS late. In addition, the trades that the firm failed to report to the RTRS were step-out trades, which were initially executed in a customer account but subsequently cancelled and re-booked to the master account for step-out trades at the firm's clearing broker. When the trades were cancelled for re-booking, the initial trade reports that were submitted to the RTRS also were cancelled. The firm did not report the corrected trades to the RTRS. The findings also stated that the firm failed to establish and maintain a supervisory system, including WSPs, reasonably designed to ensure compliance with MSRB Rule G-14. The firm's WSPs did not define "time of trade" and the firm failed to train its operations personnel on how the RTRS procedures and MSRB guidance define "time of trade." Further, the firm's written procedures failed to address what steps supervisors should take to review whether operations personnel were entering accurate time of trade information. In addition, the firm's WSPs failed to address how a designated principal should review reports from the MSRB and the firm's clearing firm regarding trade reporting for Rule G-14 compliance or outline steps the principal should take upon identifying errors or discrepancies. The firm later changed the settings in its order entry system for municipal securities relating to time of trade, provided additional training to personnel, and updated its WSPs. ([FINRA Case #2022073420401](#))

**Goldman Sachs & Co. LLC ([CRD #361](#), New York, New York)**

May 13, 2025 – An AWC was issued in which the firm was censured and fined \$1,450,000, of which \$1,355,000 is payable to FINRA. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to accurately report data to the Consolidated Audit Trail (CAT) Central Repository for 36.6 billion order events and failed to reasonably supervise its compliance with its CAT reporting obligations. The findings stated that the firm had six unique CAT reporting error types, two of which accounted for approximately 36 billion of the inaccurately reported events. For over 33 billion reportable events, the firm did not submit the counterparty restriction handling instruction to CAT while the firm reported over 2.9 billion equity order events with an inaccurate customer displays instruction flag. Subsequently, the firm remediated these issues. The findings also stated that the firm made over 90 million inaccurate order memoranda, inaccurately reported over 6.8 million trades and overreported over 98,000 trades to a trade reporting facility and issued over 372,000 inaccurate trade confirmations. The firm implemented a technology update that converted certain principal orders to agency orders. The reconfiguration caused trade reporting violations. The findings also included that the firm failed to establish and maintain a supervisory system reasonably designed to achieve order capacity accuracy. The firm did not have a process to review the accuracy of the capacity reflected in the firm's books and records, trade reports, or trade confirmations. ([FINRA Case #2022074103601](#))

**BTG Pactual US Capital, LLC ([CRD #149486](#), New York, New York)**

May 14, 2025 – An AWC was issued in which the firm was censured and fined \$400,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish and implement policies and procedures for its anti-money laundering (AML) compliance program that could be reasonably expected to detect and cause the reporting of suspicious transactions. The findings stated that firm's procedures did not describe how it should monitor transactions involving customer money movements for AML red flags or how such monitoring should be documented. The firm utilized a third-party tool to conduct automated post-transaction monitoring, but the firm failed to develop and implement reasonable procedures to conduct timely reviews of the tool's output and follow-up investigation of red flags. The firm's procedures did not reasonably address the firm's process for reviewing, escalating, and documenting the alerts generated by the third-party tool. The firm failed to reasonably monitor and detect that the third-party automated monitoring tool was not working as intended to detect certain outgoing wire transfers to high-risk geographic locations. The firm has since worked with its third-party vendor to ensure that its third-party monitoring tool is working as intended to generate alerts on outgoing wires and implemented a new system to review outgoing wire requests. The firm has also revised its written procedures with respect to customer callbacks, pre-approval of customers' outgoing wire requests, and post-transaction monitoring of outgoing wires. ([FINRA Case #2020065115301](#))



**Honeycomb Portal LLC (Funding Portal Org ID #289015, Pittsburgh, Pennsylvania)**

May 14, 2025 – An AWC was issued in which the firm was censured, fined \$140,000, and required to comply with the undertaking enumerated in this AWC. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that while acting as an intermediary for an issuer in two Section 4(a)(6) of the Securities Act of 1933 (Reg CF) offerings, it knew or should have known that a separate funding portal affiliated with the issuer was improperly acting as an intermediary in the issuer's two offerings. The findings stated that the firm acted as an intermediary for the issuer in the two Reg CF offerings while the separate funding portal affiliated with issuer also performed certain functions in both offerings that are required to be performed only by an intermediary. The firm lacked a reasonable basis to believe that the issuer was in compliance with the requirement in Reg CF Rule 100(a)(3) to conduct an offering exclusively through one intermediary. The findings also stated that the firm failed to make and preserve certain required records. The firm failed to preserve certain electronic communications with the issuer related to its two Reg CF offerings. The firm deleted, or permitted the separate funding portal affiliated with the issuer to delete, the electronic communications, without retaining copies. ([FINRA Case #2020068899801](#))

**Public Ventures, LLC dba MDB Capital ([CRD #42677](#), Addison, Texas)**

May 19, 2025 – An AWC was issued in which the firm was censured, fined \$50,000, and required to comply with the undertakings enumerated in this AWC. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish and maintain a supervisory system, including WSPs, reasonably designed to address certain conflicts of interest and to prevent the misuse of material nonpublic information (MNPI). The findings stated that the firm's WSPs required certain trade blotter reviews by a designated supervisor but did not describe how the reviews should be conducted by the supervisor or specifically address trading in start-up companies' stock. In practice, the firm's surveillance of trading in the start-up companies' stock relied on a supervisor's review of a daily trade blotter that did not clearly identify trades subject to certain conflicts of interest. At times other firm supervisors engaged in an ad hoc review of trading blotters that was not pursuant to any written criteria or documented by the firm. The firm's supervisory system also did not reasonably address the potential for misuse of MNPI where firm representatives served on the boards of the startup companies. The firm had a general "Need to Know" policy and required representatives to sign an annual insider trading attestation acknowledging having read that policy and disclosing if they were aware of any policy violations. The attestation did not ask representatives if they possessed or had possessed MNPI. The "Need to Know" policy and the firm's WSPs more generally did not address when its representatives served on the boards of its startup companies or establish reasonable procedures to prevent the dissemination of MNPI to these

representatives' colleagues and customers. Instead, the firm's supervisory system relied on the start-up companies and representatives to independently identify and notify the firm when they came into possession of MNPI in order to place affected securities on a restricted list. ([FINRA Case #2018060977201](#))

**Wells Fargo Clearing Services, LLC ([CRD #19616](#), St. Louis, Missouri)**

May 19, 2025 – An AWC was issued in which the firm was censured and fined \$150,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish and maintain a supervisory system, including WSPs, reasonably designed to safeguard customer information. The findings stated that when registered representatives left the firm, it would notify insurance carriers so the carriers would remove these representatives' access to firm customers' variable annuity accounts on the carriers' portals. The firm provided notice only for representatives it characterized as "producing" (i.e., tasked with selling products to customers) and did not notify insurance carriers when "non-producing" representatives departed. However, the firm miscategorized certain producing registered representatives as non-producing in its internal system. Therefore, when these registered representatives departed, the insurance carriers were not notified. As a result, these former representatives continued to maintain their access to firm customers' variable annuity accounts on the carriers' portals, including the customers' names, addresses, account numbers, account balances, and in at least some instances, other nonpublic personal information such as dates of birth and social security numbers. Subsequently, the firm notified the carriers of the former representatives it had previously omitted. The firm also modified its procedures to require carriers be notified of all representatives who leave the firm, regardless of their status as producing or nonproducing. ([FINRA Case #2021073472601](#))

**AAG Capital, Inc. ([CRD #188](#), Wesley Chapel, Florida)**

May 20, 2025 – An AWC was issued in which the firm was censured, fined \$100,000, ordered to pay \$38,591.39, plus interest, in restitution to customers, and required to comply with the undertakings enumerated in the AWC. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish and maintain written policies and procedures and a supervisory system reasonably designed to comply with Reg BI for recommendations to retail customers regarding registered index-linked annuities (RILAs). The findings stated that the firm did not reasonably supervise recommendations that retail customers exchange insurance policies, fixed index annuities, and variable annuities for RILAs. In reviewing the recommendations, the firm failed to reasonably consider various disadvantages of the exchanges. The documentation for these exchanges submitted for supervisory review, which included some comparative disclosures that were limited in scope, did not include information sufficient to determine why the



customers would benefit from the recommended RILA despite certain disadvantages arising from the surrender of the customer's existing investment, including the relinquishment of death benefits or income riders, or the incurrence of surrender charges. The firm's supervisory system also failed to ensure that the firm and its supervisors reasonably identified and followed up on red flags, such as patterns of customers relinquishing riders and benefits and incurring surrender charges as a result of exchange recommendations. ([FINRA Case #2022073342401](#))

**Calton & Associates, Inc. ([CRD #20999](#), Tampa, Florida)**

May 20, 2025 – An AWC was issued in which the firm was censured and fined \$75,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to disclose required mark-up and mark-down information on hundreds of retail customer confirmations for municipal securities transactions and corporate and agency debt securities transactions. The findings stated that these failures stemmed from inadvertent errors made by certain firm personnel when manually entering the orders into its clearing firm's system. The findings also stated that the firm failed to report the correct time of trade or execution for municipal securities transactions and corporate and agency debt securities transactions. The firm uniformly reported "00" in the seconds field for these fixed income and municipal securities transactions, notwithstanding that the firm's system was capable of correctly reporting seconds and the time of trade execution was known to the second. The findings also included that the firm's supervisory system was not reasonably designed to comply with MSRB Rules G-14 and G-15 and FINRA Rules 2232 and 6730. The firm's WSPs did not address the requirement to report time of trade to the RTRS, or time of execution to the Trade Reporting and Compliance Engine (TRACE), to the second until April 2021. In July 2024, the firm's WSPs were updated to explain how to review the accuracy of its RTRS and TRACE reports with respect to time of execution, the frequency of the reviews, who was responsible for performing the reviews, and the method by which the reviews should be documented. ([FINRA Case #2020065108002](#))

**Open to the Public Investing, Inc. ([CRD #127818](#), New York, New York)**

May 27, 2025 – An AWC was issued in which the firm was censured, fined \$350,000, and required to comply with the undertakings enumerated in this AWC. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it paid individuals with followings on social media sites to promote the firm in social media communications, some of which included statements that were not fair and balanced or made claims that were misleading or unwarranted. The findings stated that the firm paid influencers either a fee for each post they created promoting the firm or a fee for every new account that was opened and funded by a customer using a unique referral link provided by the firm. The firm did not limit the compensation influencers could earn. The

influencers' posts were widely distributed, and customers opened and funded more than 23,000 new accounts with the firm using the unique referral links provided to influencers. The firm's influencers posted communications claiming that the firm offered "commission free trades" but did not disclose that other fees may apply or provide a link to the firm's fee schedule. In addition, some influencers promoted the ability to buy fractional shares through the firm but did not disclose certain limitations associated with investing in fractional shares, including, for example, that fractional shares may not be transferable to another broker-dealer. Further, several posts also failed to clearly identify the communications as paid advertisements. The findings also stated that the firm did not have a registered principal review and approve all influencers' static posts promoting the firm prior to posting on social media platforms. The firm also did not maintain a copy of all influencer posts promoting the firm or the name of any registered principal who approved the communication and the date of approval (where applicable). The findings also included that the firm failed to establish, maintain, and enforce a system, including WSPs, reasonably designed to supervise its obligations with respect to its influencers' retail communications. As a result, the firm was unable to review and approve the content of all influencer communications. In addition, the firm did not establish or maintain a supervisory system reasonably designed to preserve records related to the influencers' communications. Subsequently, the firm revised its WSPs to enhance its supervision with respect to influencer communications promoting the firm. ([FINRA Case #2021072581501](#))

**Firsttrade Securities Inc. ([CRD #16843](#), Flushing, New York)**

May 28, 2025 – An AWC was issued in which the firm was censured and fined \$85,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it distributed retail communications concerning crypto assets or crypto asset-related services which failed to clearly disclose that crypto assets were not offered through a registered broker-dealer, or which did not provide a fair and balanced presentation of the benefits and risks of the products discussed. The findings stated that most of these communications failed to prominently disclose that the crypto assets were not offered by the firm, but were offered by an affiliate, which, unlike the firm, was not a registered broker-dealer or member of FINRA or the Securities Investor Protection Corporation (SIPC). Many also failed to prominently disclose the name of the firm and reflect which products were being offered by the firm. In addition, most of these communications failed to provide balanced treatment of risks and potential benefits, such as omitting that the crypto assets described in those communications were speculative and involved a high degree of risk. Thereafter, the firm's crypto affiliate ceased offering crypto assets and, as a result, the firm ceased distributing retail communications concerning crypto assets offered by its affiliate. ([FINRA Case #2022076785901](#))

**Barclays Capital Inc. ([CRD #19714](#), New York, New York)**

May 29, 2025 – An AWC was issued in which the firm was censured and fined a total of \$2,250,000, of which \$303,000 is payable to FINRA. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish and maintain a supervisory system and regulatory risk management controls reasonably designed to monitor for potential layering and spoofing of options. The findings stated that as a result, the firm sent millions of options orders to the options exchanges without being surveilled for spoofing or layering. Specifically, none of the firm's surveillances for layering and spoofing included options order activity, and its WSPs did not reference surveilling options for layering and spoofing. In addition, the firm did not maintain regulatory risk management controls and immediate post-trade execution reports so as to allow it to surveil for potential spoofing and layering for options orders that the firm routed directly to the options exchanges. Further, the firm's parameters for surveillances required that the aggregated volume of potentially manipulative orders by account be at least 20 times greater than the average trade size of the security. This parameter was unreasonable because layering and spoofing can occur with smaller-sized orders. The firm subsequently made changes to lower this threshold. The findings also stated that the firm failed to establish and maintain a supervisory system reasonably designed to supervise for potential layering and spoofing of equities orders sent to certain exchanges. The firm began relying on a third-party surveillance system to monitor its equities orders for potential layering and spoofing activity. During the system's implementation, the firm mistakenly designated two national securities exchanges as "dark" venues instead of "lit" venues, which caused the firm's equities order flow sent to these exchanges to be excluded from the surveillance for potential layering and spoofing. Subsequently, the firm correctly designated the two national exchanges as lit venues in the third-party surveillance system and began surveilling orders sent to the exchanges for potential layering and spoofing. ([FINRA Case #2021072379301](#))

**General Securities Corp ([CRD #15062](#), North Kansas City, Missouri)**

May 30, 2025 – An AWC was issued in which the firm was censured, fined \$25,000, and required to comply with the undertaking enumerated in this AWC. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it willfully violated Section 17(a)(1) of the Securities Exchange Act of 1934 and Exchange Act Rule 17a-14 by failing to disclose its own and its registered representatives' disciplinary history in the firm's Form CRS and failing to comply with the instructions for Form CRS. The findings stated that when the firm filed its initial Form CRS, it failed to respond "Yes" to the question concerning legal and disciplinary history, even though the firm and two of its registered representatives in fact had prior reportable legal or disciplinary history. The Form CRS also omitted the required heading and conversation starters for Item 4. Subsequently, the firm filed an amended Form CRS on which it responded "Yes" in response to the question concerning legal or disciplinary history. However, the amended Form CRS still omitted the required heading. ([FINRA Case #2024080209001](#))

## Individuals Barred

### **Mario L. Martinez ([CRD #6144561](#), Miami, Florida)**

May 1, 2025 – An AWC was issued in which Martinez was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Martinez consented to the sanction and to the entry of findings that he failed to provide documents and information requested by FINRA in connection with its investigation into the allegations received in a tip made to FINRA concerning the claim that he took a loan from a client, among other things. ([FINRA Case #2025084654201](#))

### **Anthony George Saab ([CRD #408501](#), Dallas, Texas)**

May 1, 2025 – An AWC was issued in which Saab was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Saab consented to the sanction and to the entry of findings that he refused to provide documents and information requested by FINRA as part of its investigation into his sale of alternative investments. ([FINRA Case #2022074295801](#))

### **Nicholas Edward Stovall ([CRD #5581487](#), New Richmond, Wisconsin)**

May 8, 2025 – An AWC was issued in which Stovall was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Stovall consented to the sanction and to the entry of findings that he participated in private securities transactions totaling \$1,401,690 without disclosing to, or seeking approval from, his member firm prior to engaging in these transactions. The findings stated that Stovall participated in the sale of promissory notes issued by entities purportedly engaged in a business that provided financing to construction companies. Stovall recommended the investments to six customers who ultimately purchased \$1,101,690 of the issuers' promissory notes. Stovall also personally purchased a note for \$300,000. Stovall participated in these investments by telling the investors about the promissory notes, explaining the notes' terms, introducing investors to the issuers, helping investors complete their investment documents, and helping investors transfer money to the issuers. Ultimately, the notes' issuers defaulted on the notes and subsequently ceased operating. In 2022, two state securities regulators brought actions against the issuers and others, alleging, among other things, that the promissory notes were part of a fraudulent scheme. Stovall was not named as a defendant in either action. ([FINRA Case #2023079339301](#))

### **Michael Richard Rosalia ([CRD #2323953](#), Blue Point, New York)**

November 12, 2024 – An Office of Hearing Officers (OHO) decision became final in which Rosalia was barred from association with any FINRA member in all capacities. In light of the bar, the OHO declined to impose any a fine. The sanction was based on the findings that Rosalia failed to appear for and provide on-the-record testimony

requested by FINRA in connection with its investigation into his alleged excessive and unsuitable trading in his customers' accounts. The findings stated that FINRA sought information and documents relating to whether Rosalia considered his customers' investment profiles when making recommendations and whether his recommendations were consistent with his customers' investment objectives and risk tolerance. ([FINRA Case #2019060753508](#))

**Johnathon Sawaged ([CRD #7061837](#), Poughquag, New York)**

May 14, 2025 – An AWC was issued in which Sawaged was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Sawaged consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony requested by FINRA in connection to its investigation of allegations made by his member firm on a Uniform Termination Notice for Securities Industry Registration (Form U5) filing. The findings stated that Sawaged was terminated from the firm for inappropriate handling of client payments while working for an affiliated tax services entity. ([FINRA Case #2024083242501](#))

**Ryan Spencer ([CRD #6595452](#), Jackson, Tennessee)**

May 14, 2025 – An AWC was issued in which Spencer was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Spencer consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony requested by FINRA in connection with its investigation into allegations made by his member firm in a Form U5. The findings stated that the firm disclosed that Spencer was permitted to resign due to non-compliance with its expense policy. ([FINRA Case #2023080288101](#))

**Nicholas Michael Armellino ([CRD #3189691](#), Haldon, New Jersey)**

May 20, 2025 – An AWC was issued in which Armellino was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Armellino consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony requested by FINRA in connection with an investigation that originated from a regulatory tip submitted to it. The findings stated that although Armellino initially cooperated with FINRA's investigation, he ceased doing so. ([FINRA Case #2021070929501](#))

**Damon Manuel Perez ([CRD #5824101](#), St. Johns, Florida)**

May 30, 2025 – An AWC was issued in which Perez was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Perez consented to the sanction and to the entry of findings that he refused to produce information and documents requested by FINRA during a matter that arose from a regulatory tip. ([FINRA Case #2024083477201](#))

**Jody Ryan Vander Weide (CRD #2571083, Grand Rapids, Michigan)**

May 30, 2025 – An AWC was issued in which Vander Weide was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Vander Weide consented to the sanction and to the entry of findings that he failed to provide documents and information requested by FINRA in connection with its investigation of his undisclosed OBA. The findings stated that Vander Weide initially cooperated with FINRA's investigation, but he stopped doing so. ([FINRA Case #2024081609001](#))

## Individuals Suspended

**John Emil Fendrich Jr. (CRD #1791002, Red Bank, New Jersey)**

May 1, 2025 – An AWC was issued in which Fendrich was fined \$5,000, suspended from association with any FINRA member in all capacities for three months, and ordered to pay \$14,214, plus interest, in partial restitution to a customer. The amount of restitution is equal to half of the commissions charged to the customer, to whom Fendrich and another registered representative both made recommendations and shared commissions. Without admitting or denying the findings, Fendrich consented to the sanctions and to the entry of findings that he willfully violated the Best Interest Obligation under Reg BI by recommending to a retail customer a series of trades that were excessive and not in the customer's best interest. The findings stated that the customer opened an account with Fendrich and the other representative at their member firm that had its investment objective as speculation. Fendrich's and the other representative's trading in the customer's account generated \$28,428 in commissions and caused \$95,393 in realized losses.

The suspension is in effect from June 2, 2025, through September 1, 2025. ([FINRA Case #2018056490328](#))

**Robert William Fort (CRD #2505390, Dallas, Texas)**

May 1, 2025 – An AWC was issued in which Fort was fined \$5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Fort consented to the sanctions and to the entry of findings that he failed to timely amend his Uniform Application for Securities Industry Registration or Transfer (Form U4) to disclose that he had been charged with a felony after he was arrested for a non-financial-related criminal offense. The findings stated that Fort disclosed to his member firm that he had been arrested and told the firm that he anticipated that his arrest would result in a felony charge. Later, Fort was indicted and charged with a felony, but he failed to notify the firm that the felony charge had been filed against him and failed to amend his Form U4. Eight months later the firm discovered Fort had been charged with a felony when the firm performed a routine background recheck. Subsequently, Fort's Form U4 was amended to disclose the felony charge.

The suspension was in effect from June 2, 2025, through July 1, 2025. ([FINRA Case #2024083309601](#))



**Frank E. Lumpuy ([CRD #2108307](#), Miami, Florida)**

May 5, 2025 – An AWC was issued in which Lumpuy was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for two months. Without admitting or denying the findings, Lumpuy consented to the sanctions and to the entry of findings that he engaged in an outside business activity (OBA) without providing complete and accurate written notice of his activities to his member firm. The findings stated that Lumpuy disclosed to the firm that he was a passive investor in two companies that were formed for the purpose of real estate investment. However, without providing any notice to or receiving approval from the firm, Lumpuy worked as an owner-manager for these companies. In this role, Lumpuy managed real estate rental properties, negotiated leases, signed annual corporate filings, and facilitated communications between the companies' members, counsel, and investors. Lumpuy also inaccurately affirmed on multiple annual compliance questionnaires that he was fully in compliance with the firm's policies and procedures. Moreover, on one occasion, the firm specifically asked Lumpuy to disclose whether any firm customers were also investors in the companies. Lumpuy failed to disclose that one of his firm customers had been an investor in the companies since approximately two years before he disclosed that he was a passive investor.

The suspension was in effect from May 5, 2025, through July 4, 2025. ([FINRA Case #2024081209801](#))

**Joseph Jemel Steward ([CRD #3241331](#), Richmond Hill, New York)**

May 6, 2025 – An AWC was issued in which Steward was suspended from association with any FINRA member in all capacities for five months and ordered to pay \$6,000 in partial restitution to a customer. In light of Steward's financial status, the sanctions do not include a monetary fine. Without admitting or denying the findings, Steward consented to the sanctions and to the entry of findings that he willfully violated the Best Interest Obligation under Reg BI by recommending to a retail customer a series of trades that were excessive, unsuitable, and not in the customer's best interest. The findings stated that the customer relied on Steward's advice and routinely followed his recommendations and, as a result, he exercised de facto control over the customer's account. Steward's trading resulted in a high turnover rate and a cost-to-equity ratio that was above the traditional guideposts. Steward's trading in the customer's account generated \$25,939 in commissions and caused \$24,568 in realized losses.

The suspension is in effect from June 2, 2025, through November 1, 2025. ([FINRA Case #2018056490330](#))

**Eduardo Leon Jr. ([CRD #2232647](#), Houston, Texas)**

May 8, 2025 – An AWC was issued in which Leon was fined \$7,500 and suspended from association with any FINRA member in all capacities for four months. Without admitting or denying the findings, Leon consented to the sanctions and to the entry of findings that he recommended that retail and non-retail customers purchase and hold a volatility-linked exchange-traded note without having a sufficient understanding of its risks and features. The findings stated that Leon willfully violated Reg BI by recommending investments that were not in the best interests of his retail customers. In addition, Leon recommended that the customers purchase a foreign currency denominated corporate bond that was not in the best interests of the retail customers and was not suitable for the non-retail customers, and in amounts that resulted in concentration levels that were inconsistent with the customers' investment profiles.

The suspension is in effect from June 2, 2025, through October 1, 2025. ([FINRA Case #2022074734102](#))

**Natalie Thai Pham ([CRD #7581512](#), Broken Arrow, Oklahoma)**

May 8, 2025 – An AWC was issued in which Pham was assessed a deferred fine of \$10,000 and suspended from association with any FINRA member in all capacities for 12 months. Without admitting or denying the findings, Pham consented to the sanctions and to the entry of findings that she made misrepresentations to a mortgage lender to help her friend qualify for and obtain a mortgage loan. The findings stated that Pham submitted two letters to the mortgage lender to help her friend qualify for and obtain a mortgage loan. The mortgage lender required the letters because the friend sought to use \$30,000 in funds allegedly gifted from Pham as part of the friend's down payment. Pham used her personal checking account held at his member firm's affiliate bank to transfer the allegedly gifted funds to the friend. The letters Pham provided misrepresented that the funds were bona fide gifts from Pham to the friend, which the mortgage lender factored into determining the friend's debt burden and ability to re-pay the mortgage loan. However, the funds were not bona fide gifts from Pham to the friend. Pham received a portion of the funds in cash from the friend shortly before making the first purported gift, and she was repaid the remaining portion of the funds shortly after making the second purported gift. In addition, Pham misrepresented in both letters that she was the friend's daughter when she had no familial relationship with the friend. The mortgage lender ultimately approved the friend's loan application, and the friend obtained a mortgage loan.

The suspension is in effect from May 19, 2025, through May 18, 2026. ([FINRA Case #2024082275401](#))

**Nicholas James Schiano ([CRD #4429212](#), Staten Island, New York)**

May 8, 2025 – An AWC was issued in which Schiano was fined \$5,000, suspended from association with any FINRA member in all capacities for six months, and ordered to pay \$55,770, plus interest, in partial restitution to customers. The amount of restitution is equal to the total commissions charged to one of the customers and half of the commissions charged to the other, of whom Schiano and another registered representative both made recommendations and shared commissions. Without admitting or denying the findings, Schiano consented to the sanctions and to the entry of findings that he willfully violated the Best Interest Obligation under Reg BI by recommending to retail customers a series of trades that were excessive. The findings stated that the customers were seniors and relied on Schiano's advice and routinely followed his recommendations and, as a result, Schiano exercised de facto control over the accounts. The recommendations made by Schiano cause the customers to pay \$71,025 in commissions and suffer \$62,244 in realized losses.

The suspension is in effect from June 2, 2025, through December 1, 2025.

([FINRA Case #2018056490325](#))

**Joseph L. Tranchina ([CRD #6085344](#), Middletown, New Jersey)**

May 8, 2025 – An AWC was issued in which Tranchina was fined \$5,000, suspended from association with any FINRA member in all capacities for five months, and is ordered to pay \$60,975, plus interest, in restitution to customers. Without admitting or denying the findings, Tranchina consented to the sanctions and to the entry of findings that he willfully violated Reg BI by recommending to two retail customers a series of trades that were excessive. The findings stated that Tranchina's trading resulted in high turnover rates and cost-to-equity ratios that exceeded the traditional guideposts of six and 20 percent, respectively, as well as significant losses. The first customer, then a 65-year-old judge, had an investment objective of speculation. Tranchina's recommended transactions in the customer's account that resulted in an annualized turnover rate of eight and an annualized cost-to-equity ratio of 32 percent and generated \$49,645 in commissions and caused \$74,331 in realized losses. The second customer, then a 54-year-old small business owner, also had an investment objective of speculation. The second customer relied on Tranchina's advice and routinely followed his recommendations and, as a result, Tranchina exercised de facto control over the account. Tranchina recommended transactions in this account resulting in a turnover rate of 21 and a cost-to-equity ratio of over 90 percent. Tranchina's trading in this account generated \$11,330 in commissions and caused \$23,818 in realized losses. The level of trading that Tranchina recommended in the two customers' accounts was excessive; not in the best interest of the first customer, and it was unsuitable for the second customer.

The suspension is in effect from June 2, 2025, through November 1, 2025.

([FINRA Case #2018056490329](#))

**Kyle Joshua Charters ([CRD #6288496](#), Chatham, New Jersey)**

May 12, 2025 – An AWC was issued in which Charters was assessed a deferred fine of \$10,000 and suspended from association with any FINRA member in all capacities for six months. Without admitting or denying the findings, Charters consented to the sanctions and to the entry of findings that he participated in a private securities transaction involving the sale of a limited partnership interest in an offering without notifying or receiving written approval from his member firm prior to his participation in the transaction. The findings stated that the offering was sponsored by a private equity firm that Charters was hoping to join. The purchaser was an institutional investor who was not Charters' customer at his firm, and the sale was outside the regular course and scope of his employment with it. Charters' participation included attending meetings with the investor about the limited partnership interest and editing marketing materials for the fund. The sale was completed when the investor committed approximately 1.4 percent of its assets in exchange for the limited partnership interest.

The suspension is in effect from May 19, 2025, through November 18, 2025. ([FINRA Case #2023078904101](#))

**Judah Spinner ([CRD #7039921](#), Las Vegas, Nevada)**

May 12, 2025 – An AWC was issued in which Spinner was assessed a deferred fine of \$10,000 and suspended from association with any FINRA member in all capacities for 12 months. Without admitting or denying the findings, Spinner consented to the sanctions and to the entry of findings that he participated in private securities transactions by soliciting individuals to invest in an investment fund without providing prior written notice to his member firm. The findings stated that Spinner spoke with interested individuals about investing in the fund, answered inquiries concerning the fund from those individuals, and provided prospective investors with a private placement memorandum describing the fund. In total, individuals invested over \$1 million in the fund.

The suspension is in effect from May 19, 2025, through May 18, 2026. ([FINRA Case #2024081111101](#))

**Phillip Curtis Anderson ([CRD #814936](#), Roseville, California)**

May 13, 2025 – An AWC was issued in which Anderson was assessed a deferred fine of \$10,000, suspended from association with any FINRA member in all capacities for five months, and ordered to pay deferred disgorgement of commissions received in the amount of \$8,280, plus interest. Without admitting or denying the findings, Anderson consented to the sanctions and to the entry of findings that he unsuitably recommended that two senior retail customers invest in speculative, unrated corporate bonds. The findings stated that Anderson's recommendations to the customers resulted in at least 96 percent and 35 percent of their respective net worth, not including primary residence, being invested in the bonds. Anderson earned a total of \$8,280 in commissions in connection with these recommendations.

One of the customers and a beneficiary of the other customer brought and settled arbitrations against Anderson's member firm relating to the bond investments.

The suspension is in effect from May 19, 2025, through October 18, 2025.

([FINRA Case #2020068830201](#))

**David Richard Ravarino ([CRD #4391591](#), Concord, California)**

May 13, 2025 – An AWC was issued in which Ravarino was assessed a deferred fine of \$10,000 and suspended from association with any FINRA member in all capacities for six months. Without admitting or denying the findings, Ravarino consented to the sanctions and to the entry of findings that he engaged in an OBA without fully disclosing the activity to the member firms he was associated with during that period. The findings stated that in 2016, Ravarino formed a limited liability company (LLC) to identify potential real estate investments. However, Ravarino used the LLC to provide consulting services to a company, a third-party administrator that provided administrative services to retirement plans. The services Ravarino provided to the company included administrative tasks, strategic planning, and customer referrals. For his services, the company paid Ravarino, through the LLC, approximately \$600,000. Prior to February 2024, Ravarino did not notify his employing firms that he was providing consulting services to the company. Although Ravarino disclosed to each firm that he owned the LLC, he falsely stated that his outside activities through the LLC were limited to real estate and that he received only \$1,500 annually from the LLC. Ravarino also falsely stated on multiple firm compliance questionnaires that he had disclosed all OBAs.

The suspension is in effect from May 19, 2025, through November 18, 2025.

([FINRA Case #2024080968801](#))

**Todd Allen Leightey ([CRD #4409118](#), Upper Sandusky, Ohio)**

May 16, 2025 – An AWC was issued in which Leightey was fined \$5,000 and suspended from association with any FINRA member in all capacities for four months. Without admitting or denying the findings, Leightey consented to the sanctions and to the entry of findings that he recommended purchases of variable annuities to three customers without a reasonable basis to believe that the transactions were suitable based on the customers' age, financial situation and needs, liquidity needs, and investment time horizon, among other factors. The findings stated that Leightey's recommendation to a married couple, one of whom was a senior, to purchase a \$100,000 variable annuity contract resulted in more than half of the customers' net worth being invested in variable annuities. In addition, Leightey recommended another customer purchase a \$6,000 variable annuity when the customer did not have any interest or need for the particular features of a variable annuity. The findings also stated that in connection with variable annuity applications submitted to his member firm for approval by a principal, Leightey inaccurately stated that these three customers intended to utilize the annuitization

and death benefit features of the purchased variable annuities and misstated two customers' intended investment horizons. This caused the firm to collect and maintain inaccurate information about these transactions and customers.

The suspension is in effect from June 16, 2025, through October 15, 2025. ([FINRA Case #2022075073501](#))

**Jose Antonio Navarro ([CRD #2250454](#), San Diego, California)**

May 16, 2025 – An AWC was issued in which Navarro was assessed a deferred fine of \$20,000 and suspended from association with any FINRA member in all capacities for 12 months. Without admitting or denying the findings, Navarro consented to the sanctions and to the entry of findings that he participated in private securities transactions without prior written notice to his member firms. The findings stated that after personally investing in an alternative energy company, Navarro introduced the investment opportunity to five of his customers. Navarro referred his customers to the company's principals, recommended the investment, and took other steps to facilitate the investments. The five customers collectively invested a total of \$87,500. Subsequently, the company filed for bankruptcy and none of the investors received their money back. One of the customers filed an investor complaint with FINRA. Navarro received no selling compensation in connection with his participation in the transactions. Navarro completed annual compliance agreements in which he falsely represented to one of his firms that he did not engage in selling away. The findings also stated that Navarro, through his disclosed outside business, a tax preparation business, borrowed a total of \$80,000 from two of his firm customers without seeking prior approval from his employing firm. The loans were documented through loan agreements that provided for repayment of the principal with interest, which were repaid in full. Furthermore, Navarro completed annual compliance agreements in which he falsely represented to his firm that he did not solicit, accept, or make loans to clients for any reason. The findings also included that Navarro initially provided a partial and misleading response to FINRA's requests for information related to his conduct. Initially Navarro provided a written response that only identified one customer that invested in the company and stated that although he mentioned his personal investment to "personal friends", "no one expressed interest." Navarro also failed to provide FINRA with relevant emails it requested. In response to a second request, Navarro corrected his prior response by providing the requested emails and disclosing the identities of the four other customers. Subsequently, in his on-the-record testimony, Navarro further testified truthfully about the scope of his participation in the private securities transactions.

The suspension is in effect from May 19, 2025, through May 18, 2026. ([FINRA Case #2023078727501](#))



**Daniel Todd Lerner ([CRD #1255769](#), Bedford Hills, New York)**

May 20, 2025 – An AWC was issued in which Lerner was fined \$5,000 and suspended from association with any FINRA member in all capacities for two months. Without admitting or denying the findings, Lerner consented to the sanctions and to the entry of findings that he recommended that a customer invest in an illiquid, proprietary limited partnership without having a reasonable basis to believe that the investment was suitable for the customer based on her investment profile. The findings stated that the customer was a 92-year-old retiree when Lerner recommended that she purchase \$60,000 of the limited partnership. Prior to this recommendation, the customer's risk tolerance was listed as moderate on her investment profile. As a result of Lerner's recommendation, the customer invested approximately 25 percent of her liquid net worth in the limited partnership. Contemporaneous with this AWC, FINRA is accepting an AWC from Lerner's member firm that orders it to pay restitution of \$3,600.00 to the customer.

The suspension is in effect from June 16, 2025, through August 15, 2025. ([FINRA Case #2019063686213](#))

**Martin Lerner ([CRD #871038](#), Delray Beach, Florida)**

May 20, 2025 – An AWC was issued in which Lerner was assessed a deferred fine of \$10,000 and suspended from association with any FINRA member in any principal capacity for one month. Without admitting or denying the findings, Lerner consented to the sanctions and to the entry of findings that he failed to reasonably supervise sales of illiquid, proprietary limited partnerships to ensure that the sales were suitable for customers given their investment profiles. The findings stated that Lerner was aware of, but failed to reasonably investigate and respond to, red flags of potentially unsuitable recommendations of the limited partnerships. These red flags included patterns of sales of the illiquid limited partnerships to seniors and unsophisticated investors. They also included sales to customers made contemporaneously with changes to those customers' investment profiles, including their liquid net worths and/or risk tolerances, which resulted in sales to customers for whom, without those changes, the customers were not eligible to purchase the limited partnerships. Upon learning of these red flags, instead of reasonably investigating to confirm that the products were suitable for these customers, Lerner approved such sales without further inquiry.

The suspension was in effect from June 2, 2025, through July 1, 2025. ([FINRA Case #2019063686212](#))

**Kenneth John Malm ([CRD #2528937](#), Suffern, New York)**

May 20, 2025 – An AWC was issued in which Malm was assessed a deferred fine of \$10,000 and suspended from association with any FINRA member in all capacities for seven months. Without admitting or denying the findings, Malm consented to the

sanctions and to the entry of findings that he accepted a bequest from the estate of a customer without having provided his member firm with written notice and without the firm having given him approval to do so. The findings stated that after the customer's death, Malm learned that he was named as a beneficiary of her estate and that he stood to inherit more than \$1 million. The customer was not a member of Malm's immediate family. Nonetheless, Malm accepted and received the bequest.

The suspension is in effect from June 2, 2025, through January 1, 2026. ([FINRA Case #2023078405601](#))

**Maxim Tulupnikoff ([CRD #6188857](#), Trumbull, Connecticut)**

May 20, 2025 – An AWC was issued in which Tulupnikoff was fined \$5,000 and suspended from association with any FINRA member in all capacities for two months. Without admitting or denying the findings, Tulupnikoff consented to the sanctions and to the entry of findings that he recommended that two customers, a married couple, invest in two illiquid, proprietary limited partnerships without having a reasonable basis to believe the investments were suitable for the customers based on their investment profiles. The findings stated that the married couple were saving for retirement when Tulupnikoff first recommended that they purchase one of the limited partnerships. Ultimately, Tulupnikoff recommended nine purchases of the limited partnerships in the customers' joint account and their Individual Retirement Accounts (IRAs), for a total of \$147,946. Prior to their first purchase, the customers' investment profile reflected that their risk tolerance was moderately conservative. In connection with this matter, FINRA previously accepted an AWC from Tulupnikoff's member firm that orders the firm to pay restitution of \$7,949.16 and \$927.60 to the customers.

The suspension is in effect from June 16, 2025, through August 15, 2025. ([FINRA Case #2019063686214](#))

**Jason David Rodriguez ([CRD #7235778](#), Clifton, New Jersey)**

May 27, 2025 – An AWC was issued in which Rodriguez was assessed a deferred fine of \$7,500 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Rodriguez consented to the sanctions and to the entry of findings that he willfully failed to amend his Form U4 to disclose two felony charges that were required to be disclosed. The findings stated that on August 2, 2023, the State of New Jersey charged Rodriguez with two felony counts of assault by automobile that were required to be reported on his Form U4. Rodriguez was aware of the felony charges but failed to amend his Form U4 within 30 days or notify his member firm of the charges at any point during his association with it. In July 2024, after FINRA inquired about the charges, the firm amended Rodriguez's Form U4 to disclose them. In addition, Rodriguez provided a false answer on a firm compliance certification question asking whether he had previously been arrested, arraigned, indicted or convicted of, or pled guilty to, or pled no contest to, any criminal offense (other than a minor traffic violation).

The suspension is in effect from June 16, 2025, through September 15, 2025. ([FINRA Case #2024082970901](#))

**Brian Court ([CRD #2591547](#), Holtsville, New York)**

May 28, 2025 – An AWC was issued in which Court was suspended from association with any FINRA member in all capacities for one month. In light of Court's financial status, no monetary sanction has been imposed. Without admitting or denying the findings, Court consented to the sanction and to the entry of findings that he exercised discretion without written authorization in connection with trades in customer accounts. The findings stated that although the customers understood that Court was placing trades in their accounts, none had given him prior written authorization to exercise discretion in their accounts and Court's member firm did not accept any of the customers' accounts as discretionary.

The suspension was in effect from June 2, 2025, through July 1, 2025. ([FINRA Case #2020068386501](#))

**Complaint Filed**

FINRA issued the following complaints. Issuance of a disciplinary complaint represents FINRA's initiation of a formal proceeding in which findings as to the allegations in the complaint have not been made, and does not represent a decision as to any of the allegations contained in the complaint. Because these complaints are unadjudicated, you may wish to contact the respondents before drawing any conclusions regarding the allegations in the complaint.

**Tejinder Singh ([CRD #2547590](#), Half Moon Bay, California)**

May 2, 2025 – Singh was named a respondent in a FINRA complaint alleging that he refused to provide documents and to appear for on-the-record testimony requested by FINRA in connection with its investigation into whether he made material misrepresentations to improperly obtain a \$38,541 Paycheck Protection Program (PPP) loan, the funds from which passed through his member firm, and whether he had failed to disclose an OBA on his Form U4. The complaint alleges that FINRA sought complete records that might show Singh's receipt and use of proceeds from the PPP loan. In connection with its investigation, Singh produced a signed declaration to FINRA in which he stated, among other things, that he applied for a PPP loan on behalf of a company in an amount of \$38,541 to pay the company's payroll costs (the cost of his services on its behalf), continuation of health care benefits, and the rent on its offices in NYC. Singh's declaration was inconsistent with public records indicating that the PPP loan was obtained by the company in order to retain three jobs. The bank and brokerage account statements and tax returns sought by FINRA, and the testimony it requested, were material to FINRA's investigation concerning whether Singh made misrepresentations in applying for a PPP loan and whether Singh timely disclosed the company as an OBA on his Form U4. Singh's failure to produce the requested documents and information or appear for testimony impeded FINRA's investigation. ([FINRA Case #2023078835001](#))

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**Firms Suspended for Failure to Provide Information or Keep Information Current Pursuant to FINRA Rule 9552**

(The date the suspension began is listed after the entry. If the suspension has been lifted, the date follows the suspension date.)

**ESF Equity, LP (CRD #173087)**  
San Clemente, California  
(May 12, 2025)

**First Commonwealth Securities Corporation (CRD #20854)**  
Atlanta, Georgia  
(May 12, 2025)

**Mercury Capital Advisors, LLC (CRD #152338)**  
New York, New York  
(May 5, 2025)

**Realblocks Private Securities, Inc. (CRD #306101)**  
New York, New York  
(March 10, 2025 – May 23, 2025)

**Realblocks Private Securities, Inc. (CRD #306101)**  
New York, New York  
(March 14, 2025 – May 23, 2025)

**Realblocks Private Securities, Inc. (CRD #306101)**  
New York, New York  
(March 28, 2025 – May 23, 2025)

**Third500, LLC (CRD #115542)**  
Wilmette, Illinois  
(May 27, 2025)

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**Firm Suspended for Failure to Meet the Eligibility or Qualifications Standards or Prerequisites for Access to Services Pursuant to FINRA Rule 9555**

(The date the suspension began is listed after the entry. If the suspension has been lifted, the date follows the suspension date.)

**EKATS Securities Inc. dba SBC Partners (CRD #284750)**  
New York, New York  
(May 29, 2025)  
FINRA Case #20240838416

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**Individuals Revoked for Failure to Pay Fines and/or Costs Pursuant to FINRA Rule 8320**

(If the revocation has been rescinded, the date follows the revocation date.)

**Stephanie Amundsen Murray (CRD #5469680)**  
Allentown, Pennsylvania  
(January 29, 2025 – May 30, 2025)  
FINRA Case #2021072336101

**Shane Edward Perry (CRD #2163879)**  
Pismo Beach, California  
(May 23, 2023 – May 22, 2025)  
FINRA Case #2020067611801

**Ariel A. Rivero (CRD #4236679)**  
Miami, Florida  
(May 2, 2025)  
FINRA Case #2021072830601

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**Individuals Barred for Failure to Provide Information or Keep Information Current Pursuant to FINRA Rule 9552(h)**

(If the bar has been vacated, the date follows the bar date.)

**Anthony Richard Bottini III (CRD #5567091)**

New York, New York

(May 5, 2025)

FINRA Case #2023080671401

**Daylon Figueroa (CRD #6816547)**

Nashville, Tennessee

(May 12, 2025)

FINRA Case #2024082304501

**Amanda E. Kriss (CRD #5158100)**

Princeton, Texas

(May 5, 2025)

FINRA Case #2024081841801

**Michael Oakley Thomas**

**(CRD #7581770)**

Lakeland, Florida

(May 5, 2025)

FINRA Case #2024083350801

**Jedidiah Ropheka Yohannes**

**(CRD #7065205)**

Dallas, Texas

(May 12, 2025)

FINRA Case #2024081636701

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**Individuals Suspended for Failure to Provide Information or Keep Information Current Pursuant to FINRA Rule 9552(d)**

(The date the suspension began is listed after the entry. If the suspension has been lifted, the date follows the suspension date.)

**Shannon Bass (CRD #4997026)**

Brooklyn, New York

(May 19, 2025)

FINRA Case #2024082081201

**Kathy Jean Koester (CRD #1210107)**

Plattsburgh, New York

(May 19, 2025)

FINRA Case #2024083119901

**James Parascandola (CRD #2866028)**

Franklin Lake, New Jersey

(May 12, 2025)

FINRA Case #2024082242101

**Noah Dewayne Shaw (CRD #6641769)**

Jacksonville, Florida

(May 30, 2025)

FINRA Case #2025084719001

**David Ryan Vega III (CRD #6290060)**

Glendale, Arizona

(May 12, 2025)

FINRA Case #2024082900601

**Andrew S. Walters (CRD #7291210)**

Lexington, Kentucky

(May 22, 2025)

FINRA Case #2024084337301

**Zachary A. Warnelis (CRD #5045792)**

Columbus, Ohio

(May 9, 2025)

FINRA Case #2024083401201

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**Individuals Suspended for Failure to Comply with an Arbitration Award or Related Settlement or an Order of Restitution or Settlement Providing for Restitution Pursuant to FINRA Rule Series 9554**

(The date the suspension began is listed after the entry. If the suspension has been lifted, the date follows the suspension date.)

**Kevin Michael Arvoy (CRD #5938015)**  
Fairfield, Connecticut  
(February 8, 2024 – May 12, 2025)  
FINRA Arbitration Case #23-01475

**Michael Barrows (CRD #2933260)**  
Ladera Ranch, California  
(May 7, 2025)  
FINRA Arbitration Case #22-01360/  
ARB250005/FINRA Case #20250849589

**Kirk James Crossen (CRD #2742256)**  
Zionsville, Indiana  
(May 1, 2025)  
FINRA Arbitration Case #23-03355

**Heather Harris (CRD #4931204)**  
Parker, Colorado  
(May 15, 2025)  
FINRA Arbitration Case #24-02322

**Brooks Burgess Johnson (CRD #1702408)**  
Isle of Palms, South Carolina  
(May 2, 2025)  
FINRA Arbitration Case #24-01552/  
ARB250010/FINRA Case #20250854871

**Eric John Ludovico (CRD #2932082)**  
Irvine, California  
(May 7, 2025)  
FINRA Arbitration Case #22-01360/  
ARB250007/FINRA Case #20250849777

**Michael Lawrence Stenson (CRD #5085396)**  
Carrollton, Texas  
(May 5, 2025)  
FINRA Arbitration Case #24-02566